

DEPARTMENT OF WORKFORCE DEVELOPMENT
DIVISION OF ECONOMIC SUPPORT
ADMINISTRATOR'S MEMO SERIES

ACTION 00-16

ISSUE DATE: 08/29/2000
DISPOSAL DATE: Ongoing

RE: Ongoing Electronic Benefit
Transfer (EBT) Operations

To: W-2 Agency Directors
County Department of Human Service Directors
County Department of Social Service Directors
County Economic Support Managers/Supervisors/Lead Workers
Tribal Chair Persons

From: Jennifer L. Noyes /s/
DES Administrator

Bruce Hagen /s/
DUI Administrator

PURPOSE: The purpose of this memo is to provide agencies with information regarding ongoing Electronic Benefit Transfer (EBT) operations.

BACKGROUND: 1995 Wisconsin Act 368 created s. 49.129, Stats. which directs the Department of Workforce Development to administer an EBT system for the delivery of food stamps as an alternative to issuing food stamp coupons. The statute also directed the Department to adopt administrative rule provisions for the administration of the EBT system. DWD14 was finalized and became effective 9-01-99.

We would like to emphasize several areas included in DWD 14. As defined in DWD 14.02, economic support (ES) agency means " a county department of social services or human services, a W-2 agency or a tribal agency which administers economic support programs, including food stamps".

- **Mandatory Participation:** All food stamp recipients shall participate in the EBT system.
- **Client Training:** The Department, through the contract with the ES agency, is responsible for training recipients and their representatives on the use of the EBT system and Wisconsin Quest card prior to receipt of benefits via EBT. Recipient training shall include: information on unlimited transactions; access to account balances; transaction receipts; availability of benefits; issuance and replacement of cards and PINs; security of cards and

PINs; the recipient's responsibilities for reporting lost, stolen, or damaged cards; accessing customer service; stale (dormant) account handling; manual transactions; access to retail stores and dispute resolution procedures.

- Card Issuance and PIN selection: The Department shall authorize the card issuer to issue the Wisconsin Quest card and mail it to the cardholder. The cardholder will select a PIN by calling the Citicorp Services, Inc. (CSI) Recipient Customer Service toll-free number listed on the back of the Wisconsin Quest card. The Department shall also require that the ES agency maintain temporary card issuance and PIN selection capability for emergency situations. Each W-2 office, IM office, and satellite office must have this capability. This requirement does not apply to outstation sites.
- Recipient Customer Service. The Department shall provide, through the contract with the EBT vendor or agent, ongoing assistance to recipients, on a 24 hours per day, seven days per week basis, on the recipients' use of the EBT system. Recipients shall access this customer service through the use of a toll-free number shown on the back of the Wisconsin Quest card and provided in training material. Recipients shall use customer service to report lost, stolen or damaged cards; obtain current account balances; obtain a transaction history for up to two months if transaction receipts are unavailable; institute card replacement and PIN change and resolve disputes regarding account transactions.
- Retailer Customer Service. The Department shall provide, through the contract with the EBT vendor, ongoing assistance to retailers on a 24 hours per day, seven days per week basis, on the retailers' use of the EBT system. Retailers shall access this customer service through the use of the toll-free number shown on the back of the Wisconsin Quest card and included in the retailer training material.
- Liability for lost benefits: The recipient is liable for benefits lost as a result of failure by the recipient to safeguard the card and PIN. In other words, benefits will not be replaced if lost as a result of loss or theft of the EBT card and PIN up to the point in time that the recipient reports the loss to Recipient Customer Service.
- Fraudulent activity: An individual may be disqualified from the food stamp program for an Intentional Program Violation (IPV) related to fraudulent EBT transactions. Disqualification for IPV is defined in 7 CFR 273.16.
- Confidentiality: The Department shall take all reasonable steps to ensure that information regarding food stamp recipients will be kept confidential by the EBT vendor and shall oversee the EBT vendor's performance in this area.
- Security: The Department shall take all reasonable steps to ensure the security of card issuance and the electronic transfer of benefits. The Department shall oversee the EBT vendor's performance in this area.

The EBT Vendor

In January 1999, DWD signed a contract with Citicorp Services, Inc. (CSI) to provide EBT services for food stamp benefits in the State of Wisconsin. CSI is the primary EBT services provider in the U.S., supporting approximately three out of every five states. CSI is responsible for food stamp account set-up and maintenance; installation of EBT-only point of sale (POS) devices in retail stores; retailer training and customer service; retailer settlement; food stamp recipient customer service; client and administrative staff training material; training state and county trainers; and providing EBT reports. CSI is also responsible for producing and mailing the permanent Wisconsin Quest card to cardholders.

System Changes

An interface was established between the State and CSI to allow the exchange of files and administrative terminal connectivity to the CSI system. CARES transmits demographic and benefit files to CSI. CSI transmits files to CARES regarding file reconciliation and EBT account activity. CARES processes specific data received from CSI to update screen information and produce reports.

Two CARES screens were changed and two new CARES screens were added:

ACDP (Designated Payee) was modified to include an "EBT form signed" field to identify an EBT authorized buyer (AB).

AGBI (Assistance Group Benefit Issuance) was modified to allow entry of an EBT code for issuance of an emergency expedited EBT benefit. The benefit is sent in an emergency file to CSI and is available to the cardholder the same day or the next day.

BIPN (PAN for Emergency Issuance) is a new screen that allows entry of the temporary Wisconsin Quest card number for a primary cardholder. This screen is used in conjunction with AGBI to issue a temporary Wisconsin Quest card for an expedited case. The demographic and card information is sent in an emergency file to CSI.

BIET (EBT Cardholders) is a new informational screen that is used to identify the most recent primary person (PP), alternate payee (AP) and authorized buyer (AB), if any, for an EBT Food Stamp case. The screen will display the name and type of each cardholder and whether the cardholder has access to the Food Stamp benefit.

According to Federal regulations, an EBT account becomes dormant when there has been no debit activity for 90 days. The household must contact the ES agency to gain access to the account. A new CARES warning letter is generated when there has been no debit activity on an EBT account in 60 days. A worker alert is also generated at 60 days. A second alert is generated when the account becomes dormant and the remaining balance in the account is greater than \$10.

Benefits that are not used in 365 days are expunged and no longer available to the Food Stamp household. CARES will first apply expunged benefits to an outstanding claim. The agency will not earn incentive on expunged funds that are applied to an outstanding claim. Any remaining amount is reflected as a returned benefit on the food stamp benefit history (IQFS).

EBT Implementation

EBT will be implemented statewide by October 2000. Each ES agency is assigned to a rollout stage and a date after which the agency is live on EBT. Refer to the attached Wisconsin EBT Rollout schedule for the agencies assigned to each Stage. The table on the next page displays the go live date for each stage.

EBT Rollout Stage	Go Live Date*
Stage 1	2/17/00
Stage 2	3/20/00
Stage 3	4/18/00
Stage 4	5/19/00
Stage 5	6/19/00
Stage 6	7/20/00
Stage 7 - Group 1	8/21/00
Stage 7 - Group 2	9/18/00
Stage 7 - Group 3	10/19/00

* After this date, all benefits generated will be EBT and the agency is operating in an ongoing mode.

Ongoing EBT Operations

The ES agency is responsible for the following ongoing EBT activities:

- **EBT Coordinator:** The EBT Coordinator is responsible for coordinating ongoing EBT activities and should continue to be the central point of contact for the resolution of EBT questions and issues. The EBT Coordinator should also be the primary person to contact the DES CARES & Policy Call Center.
- **Internal Policies and Procedures:** Develop policies and procedures to integrate EBT into ES agency operations. A model form is provided to assist agencies with identifying and tracking specific EBT activities. Refer to the attached EBT Tracking/Distribution Model Form.
- **Client Training:** At food stamp application, discuss the EBT Question and Answers brochure with the client. Make the EBT Video and ARU (Automated Response Unit) Video available for client viewing. Respond to client questions regarding EBT.
- **Emergency Card Issuance and Replacement:** Each ES agency must have the capability to issue a temporary Wisconsin Quest card for an emergency situation. Each W-2 office, IM office, and satellite office must have this capability. This requirement does not apply to outstation sites. The ES agency must establish a uniform policy regarding emergency card issuance and replacement. At minimum, a temporary card must be issued if a mailed card will not be received within 7 days for an expedited application or 30 days for a non-expedited application. The ES agency must issue a temporary replacement card if the cardholder will not receive a mailed replacement card within 5 business days. The ES agency may establish policies covering other circumstances. As an example, the agency may issue a replacement card for a client needing a card immediately to keep a normal

shopping pattern. When a temporary card is issued by the agency, CSI will issue a permanent replacement card and mail it to the cardholder.

- **Personal Identification Number (PIN) Selection:** The primary method for PIN selection for a mailed card is through Recipient Customer Service. Tell the client how to select a PIN through Recipient Customer Service. Each ES agency must have the capability for PIN selection through the Card Activation and PIN Selection (CAPS) device. The ES agency may assist a cardholder who received a mailed card in selecting a PIN using the CAPS device. When a temporary Wisconsin Quest card is issued, the ES agency must assist with PIN selection using the CAPS device. DWD will supply the CAPS device(s) needed for ongoing operations.
- **Card Security:** Establish procedures to ensure that Wisconsin Quest cards are kept in a secure place and handled in a secure manner. Extreme care should be taken when issuing cards to avoid giving a card to the wrong individual or assigning a card to the wrong case. The ES agency is responsible for correcting a loss of benefits that may occur because an individual is given inappropriate access to another individual's account.
- **CARES changes:** Update demographic and cardholder information on ACCH, ACMA, ACPA, ANID and ACDP for open and closed FS cases to ensure that the appropriate individuals have access to the EBT account and can receive an initial or replacement card in the mail at the correct address. Ensure that primary persons (PP), alternate payees (AP) and authorized buyers (AB) are correctly designated.
- **Repayments:** Collect voluntary EBT returns and repayments and enter the collected amount on the CSI system.
- **Coupon Conversion:** Convert EBT benefits to coupons if the household moves out of state.
- **Dormant accounts:** Reactivate dormant accounts on the CSI system when the household requests access to the dormant account. If the FS case reopens after the account becomes dormant, CARES will send a reactivate record to CSI.
- **Returned cards:** Follow up on cards returned to the State. The worker will get an alert that the card was returned to the State. An EOS report will provide the reason for the return and the address on the card mailer to assist the worker.
- **Fraud activity:** Take administrative action to establish IPV's in cases of client EBT fraud referred to you by the DWD, Division of Unemployment Insurance (DUI) Public Assistance Fraud Section (PAFS) under procedures disseminated by that unit.
- **Fair Hearings:** The client has a right to request a fair hearing at any time. If you need to provide documentation on an EBT transaction, this information is found on the CSI system. If the transaction is more than 90 days old, contact the DES CARES & Policy Call Center at (608) 261-6317 (Option #1) to request this information.
- **Issues or complaints regarding CSI or retailers:** Report issues or complaints regarding CSI or retailers to the DES CARES & Policy Call Center at (608) 261-6317 (Option #1).

Access to the CSI System

Access to the CSI system will be granted only to staff given the responsibility to issue cards and PINs, research problems, approve benefit issuance, or investigate abuse. As a general policy, access should be provided to a limited number of staff in an ES agency. There may be system performance problems if there are too many concurrent users.

There are three different security profiles set up in the CSI system for ES agency staff:

- Local Office Inquiry Access
- Local Office Card Issuance (inquiry and update access), and
- Local Office Fiscal Support (inquiry and update access).

Staff with the Local Office Card Issuance profile should also have security access to the CAPS device. To get access to the CAPS device, staff must complete DES-11701, CAPS Security Form. For CSI system access, submit DES 11702, User ID Security Form, and check the security profile needed. Fax or send the forms to the DES Security Officer. Any request for access to the CSI system or CAPS device must be accompanied by a completed DES 10 (Computer Access Request).

The US Department of Agriculture, Food and Nutrition Service (FNS) requires that certification and issuance responsibilities be divided. This requirement also applies to EBT. No employee should have access that would allow the employee to set up a false case, authorize benefits, and provide an EBT card and PIN. Dormant accounts and returned cards suggest that the eligibility of the household should be reviewed. Eligibility staff, not EBT issuance staff, should handle dormant accounts and returned cards. Card issuance staff will not be able to perform any of the fiscal functions. The fiscal functions are coupon conversion, account repayment, and dormant account maintenance.

If someone leaves the agency or changes jobs within the agency, access to the CSI system should be ended or reconsidered. DES will review EBT access information to determine whether the access is being used, if it is still needed, and if a lower level of access is appropriate. If someone has not used his/her CSI ID for more than 3 months, the user will get the error message "Authentication Record Frozen". The user must contact the Call Center at (608) 261-6317 (select the security option) for a password reset and ID enable.

Dual CSI Security Profile

In limited circumstances, a dual security profile for card issuance and fiscal functions may be allowed. If the ES agency does not have enough staff to provide coverage and a backup for each profile, a supervisor may be given dual security. The ES agency must request dual security and explain why it is needed. *We are finalizing this procedure with CSI and will notify you when this profile becomes available.*

EBT Policies and Procedures

EBT policy and procedures are described in the Wisconsin EBT Guide. The Guide is provided to state and ES agency staff that attend EBT training.

EBT-related forms, brochures are available and can be ordered by contacting Barb Albrecht by mail at DWD/DES, P.O. Box 7935, Madison, WI 53707-793573, by fax at (608) 267-3240 or by

email at albreba@dwd.state.wi.us. Videos may be obtained by contacting Annette Duffey by email at duffean@dwd.state.wi.us, by fax (608)267-2269 or by phone at (608) 266-5498. Refer to the attachment for a current list of forms and other EBT materials.

EBT Troubleshooting Contact List

We have provided a list of contacts to help local agencies respond to EBT questions or issues. The EBT Coordinator in each agency should be the central point of contact for the resolution of EBT questions and issues. The EBT Coordinator should also be the primary person to contact the DES CARES & Policy Call Center. Refer to the attachment.

ACTION SUMMARY STATEMENT: The ES agency is responsible for the ongoing EBT activities described above.

REGIONAL OFFICE CONTACT: Area Administrator

CENTRAL OFFICE CONTACT: DES CARES & Policy Call Center
Email: carpolcc@dwd.state.wi.us
Telephone: (608) 261-6317 (Option #1)
Fax: (608)261-6968

Attachments:

DWD 14 http://folio.legis.state.wi.us/cgi-bin/om_isapi.dll?clientID=71584&infobase=code.nfo&j1=ch.%20dwd%2014&jump=ch.%20dwd%2014&softpage=Browse_Frame_Pg

EBT Rollout Schedule

EBT Tracking/Distribution Model Form

Local Agency EBT Troubleshooting Contact List

EBT-Related Forms, Brochures, and Videos